UNITED STATES DISTRICT COURT District of Minnesota

UNITED STATES OF AMERICA.

INDICTMENT CR16-2 KES/VLD

Plaintiff,

18 U.S.C. § 115(a)(1)(B) 18 U.S.C. § 875(c)

v.

KHAALID ADAM ABDULKADIR,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Threatening to Murder a Federal Judge)

On or about December 9, 2015, in the State and District of Minnesota, the defendant,

KHAALID ADAM ABDULKADIR,

did threaten, by posting tweets to his Twitter account, to murder a United States judge, specifically intending to impede, intimidate, and interfere with such federal judge while he was engaged in the performance of his official duties, and to retaliate against such federal judge on account of the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT 2

(Threatening to Murder Federal Law Enforcement Officers)

On or about December 9, 2015, in the State and District of Minnesota, the defendant,

SCANNED

JAN 0 5 2016

U.S. DISTRICT COURT ST. PAUL

CASE 0:16-cr-00002-KES-VLD Document 43 Filed 01/05/16 Page 2 of 2 United States v. Khaalid Adam Abdulkadir

KHAALID ADAM ABDULKADIR,

did threaten, by posting tweets to his Twitter account, to murder federal law enforcement officers, specifically intending to impede, intimidate, and interfere with such federal law enforcement officers while they were engaged in the performance of their official duties, and to retaliate against such federal law enforcement officers on account of the performance of their official duties., in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT 3

(Interstate Transmission of a Threat to Injure the Person of Another)

On or about December 9, 2015, in the State and District of Minnesota, the defendant,

KHAALID ADAM ABDULKADIR,

did transmit in interstate or foreign commerce a communication, specifically, the defendant posted tweets to his Twitter account, containing language the defendant knew to be a threat, and knowing that the tweets would be viewed as threats, to injure the person of another, to wit, a federal judge and federal law enforcement officers, in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL

		•	· ·	4	
UNITED STATES ATTORNEY	-	FOREPEI	RSON	J.	